

STATEMENT OF GINGER SWARTZ ON BEHALF OF
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TO THE U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

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REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF SPENT
NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN,
NYE COUNTY, NEVADA

PRESENTED AT THE PUBLIC HEARING
IN CALIENTE, NEVADA
NOVEMBER 9, 1999

The draft Environmental Impact Statement (EIS) for the proposed Yucca Mountain high-level radioactive waste repository program and the public process by which the U.S. Department of Energy (DOE) is seeking to obtain public comments on the draft document are substantively and legal deficient. Among other deficiencies:

- 1 • [The draft EIS does not contain an accurate description of the project;]
- 2 • [It postulates a "no action" alternative that is unrealistic and unreasonable;]
- 3 • [It fails to adequately evaluate the health, safety, and environmental impacts of a program that will intentionally - as part of the so-called waste isolation strategy - contaminate a groundwater source that is currently and will be in the future used by people for drinking, food production, and other needs;]
- 4 • [It fails to adequately assess cumulative impacts from past, current, and future activities at the Nevada Test Site (NTS);]
- 5 • [It fails to identify spent fuel and high-level waste shipping modes and routes in a way that permits people in affected communities to participate in the review and public comment process;] and
- 6 • [It completely ignores the potential for major and widespread socioeconomic impacts from the project, both in Nevada and in cities and communities throughout the nation.]

7 [With respect to Caliente, Lincoln County and eastern Nevada, the draft EIS ignores issues and impacts associated with potential cumulative effects of radiation exposures from atmospheric releases associated with the testing of nuclear weapons. As a "downwind" region, Lincoln County, the City of Caliente, and other parts of eastern Nevada were regularly exposed to exposures from fallout, first as a result of above ground atomic tests and later as a consequence of containment failures involving underground tests.

The draft EIS should have comprehensively evaluated the potential health effects of these past exposures in light of the cumulative exposures that would occur as a result of the operations of a repository and the transportation of spent fuel and high-level radioactive wastes through Caliente and other eastern Nevada communities. Especially significant are potential impacts to current residents who were either present during radiation exposures from testing activities or who are in any way genetically related to residents so exposed.

8 [Likewise, the draft EIS fails to adequately evaluate the range of impacts associated with the location and operations of an intermodal transfer facility in Caliente and with the transportation of spent fuel and high-level wastes from Caliente to Yucca Mountain.] Mr. Robert Halstead, Transportation Advisor for the Nevada Agency for Nuclear Projects, will address this issue in more detail later in this hearing.

9 [The draft EIS ignores a robust and extensive body of research produced by the State of Nevada, by independent researchers, and even by DOE contractors that clearly demonstrates the socioeconomic risks and potential impacts associated with a repository and repository-related spent fuel and high-level waste transportation.

It is well documented that people react strongly and negatively to nuclear waste facilities and activities. In fact, nuclear waste is consistently ranked among the highest risks to be encountered. In response to such perceptions, people behave in ways that have direct and measurable economic consequences (i.e., avoidance of places and products associated with nuclear imagery or stigma). The draft EIS ignores this finding and does not consider the economic consequences of such stigma to cities, such as Las Vegas and other tourist destinations, and to rural communities like Caliente and Lincoln County.]

10 The State of Nevada will be submitting extensive written comments on this Draft Environmental Impact Statement for a high-level nuclear waste repository at Yucca Mountain. [It is our hope that these comments and those of all others will be seriously considered, and that a reasonable No Action alternative (as opposed to the unreasonable and unrealistic ones contained in the draft document) is selected as the preferred action in the Final Environmental Impact Statement.]

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